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January 11, 2022

VIA ECF

Magistrate Judge James R. Cho
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Hough v. Maraj and Petty*, Case No. 21-cv-04568-ENV-JRC

Dear Magistrate Judge Cho:

I write as counsel to Defendant Onika Tanya Maraj (“Defendant”). Plaintiff Jennifer Hough (“Plaintiff”) failed to file any reply papers yesterday, the date by which they were obligated to do so under Your Honor’s December 8, 2021 Order. Nor did they request my consent to a late filing. Plaintiff has thereby waived her right to submit reply papers, and I respectfully ask Your Honor to deem any papers they file today or thereafter a nullity.

Plaintiff’s frivolous motion for a default judgment is predicated upon a claim that no leniency on due dates should be granted to Defendant because “[t]his case is about whether fame and fortune make one immune to the law.” (Dkt. No. 25, at p. 5). I agree that Defendant is not entitled to special treatment because of her wealth and fame, although she has never made that claim. By the same token, though, Plaintiff also is not “immune to the law” because she is suing someone who is a celebrity. By failing to submit her reply papers on time without even an explanation or my consent to an extension of the due date, Plaintiff has intentionally failed to comply with a court order – a failure far more serious and inexcusable than a late response to a complaint. She should not be excused from that failure.

Respectfully yours,

/s/ Judd Burstein

Judd Burstein